



OLD OAK NEIGHBOURHOOD FORUM

Liz Peace CBE
Chair, Old Oak and Park Royal Development Corporation
Brent Civic Centre, 32 Engineers Way, Wembley HA9 0FJ
By email

12th April 2022

Dear Liz Peace,

OPDC's approach to development and the Inspector's report on the OPDC Local Plan

The Old Oak Neighbourhood Forum and Grand Union Alliance had an initial discussion on the Inspector's report on the OPDC Draft Local Plan, at its open meeting on April 5th.

Assuming adoption by OPDC in the coming weeks, this Local Plan will set a policy and site allocation framework for high rise/high density residential buildings at Old Oak for the next 5 years or longer. The document has been long in preparation, and in its final form will include the product of interactions between OPDC planning officers and the Inspector very late in the Examination process (January/February 2022).

The content of these late changes to the Draft Plan have not been the subject of public consultation, at any of the four stages through which the plan has been prepared during the years 2016-2022 (Regulation 18, 19.1, 19.2 and the modifications consultation last summer). A final set of modifications on locations and 'appropriate heights' for tall buildings has been made by the Inspector, by way of his response to a submission from OPDC officers (OPDC-51 dated 26th January 2022).

As far as the public record shows, OPDC-51 was neither seen nor approved by the OPDC Planning Committee nor the Board. Yet its content and the Inspector's response to these proposed late modifications will have a profound impact on the lives of many residents in the Old Oak area.

These are not abstract concerns for a future period once the OPDC Local Plan is in force. We have written separately to Emma Williamson questioning the process through which residents in suburban homes west of Acton Cemetery have suddenly been confronted with developer proposals for two developments of 44 and 23 storeys, at sites at 5-7 Park Royal West.

Since the Inspector's examination has now concluded, we cannot raise with him what we see as a premature conclusion to the modification stage of the Local Plan. As you will know, he is requiring over 450 Major Modifications in all, as necessary for the plan to be assessed as 'sound'.

The way that the Inspector has chosen to handle OPDC-51 we believe to be contrary to section 6 of the Planning Inspectorate's Procedure Guide (in terms of lack of public consultation). Paragraphs 168 and 169 of the Inspector's report refer. We appreciate that a Planning Inspector has discretion

to make modifications which he feels are necessary for soundness. But where these involve changes to the Policies Map, our understanding is that such modifications should have been consulted on. We have written to Emma Williamson with the details of our concerns.

In these unexpected circumstances, we are writing to you in the hope that both the Planning Committee and the OPDC Board will be willing to carry out a series of steps which would help the public at Old Oak to understand the implications of the Local Plan and its forthcoming adoption.

The steps we are requesting are as follows:

- A public report to the OPDC Planning Committee explaining the contents of OPDC-51 and its implications for future OPDC decision on tall buildings in a series of locations at Old Oak (the added modifications on 'appropriate building heights' affect several 'Places' in the Local Plan).
- a public report of the views of the Planning Committee on OPDC-51, referred on to the Board for consideration at the time of a decision on whether or not to adopt the Local Plan (expected to be June 22nd).
- a consultation and awareness-raising exercise mounted by OPDC on the implications of OPDC-51 in terms of suitable locations and appropriate heights for tall buildings within the OPDC area – to address the absence of public consultation on these last minute Major Modifications. (The Inspector was asked to require OPDC to consult on OPDC-51 before concluding the Examination, but chose not to do so).
- the holding of one or more OPDC 'stakeholder workshops' to discuss the four major residential developments in Acton in the current pipeline for OPDC decision¹. OPDC committed to convening such tripartite workshops, giving the public an opportunity to question and comment on developer proposals in front of OPDC planning officers, in its statutory Statement of Community Involvement (re-adopted by OPDC in November 2020). No such events have been held for several years.
- A round table session at which OPDC Board and Planning Committee members hear evidence from the three neighbourhood forums and the Grand Union Alliance, on why local people feel that levels of community engagement at pre-application stage on major developments have been inadequate to date – as compared with other London planning authorities. This would include discussion on the role in 'engagement' of the OPDC Board and Planning Committee members, and of the OPDC Community Review Group. If the OPDC is not going to adhere to the pre-application dialogue committed to in its SCI, this document needs to be updated.

We are well aware of the wider context within which the Corporation is working. The next year or so following belated adoption of the Local Plan will be critical. We continue to press for publication of the OPDC Strategic Outline Business Case, and we note the Mayor's acceptance of the recommendations of the Kerslake Report on affordable housing delivery across the GLA family.

At present, the feedback from our membership of Old Oak and Acton residents is negative, to the point of despair at what is happening on the ground at Old Oak. The attitudes and behaviours of HS2, a body under increasing criticism for its dealings with the public, do not help. But OPDC is being seen in a similar light, as refusing to be honest with the public on key issues of housing densities, transport connectivity, and building heights. The final stages of the Local Plan examination have reinforced these concerns.

¹ These four developments are One Portal Way and the Pocket Living proposals at Atlas Wharf (applications under consideration by OPDC) and 3 School Road and 5-7 Park Royal Road, on which developers have held pre-application webinar sessions stating that final proposals will be submitted shortly for planning consent.

At our April 5th meeting, we heard from one of the residents who has taken up a lease at Oakland Rise (the development of 605 housing units by Notting Hill Genesis and the first major development to be consented by OPDC). She and 36 of her neighbours have sent a joint letter to Notting Hill Genesis with a catalogue of complaints about breaches of landlord agreements, faults in the building fabric, repairs not dealt with, false promises made to new occupants on shops and facilities that would be on hand, lack of warning that the development is 'car-free', and resultant chaos over parking on roads which have not been adopted by either LBHF or LB Ealing.

Many of these new occupants of Oaklands Rise have been lured into taking up occupation with marketing material claiming that the HS2/Crossrail connection is 'coming soon'. As we repeatedly pointed out in consultation responses on the Local Plan, the content of a supposedly sober and objective Local Plan drifts frequently into unsubstantiated hype on the attributes of a potential new part of London. The Inspector refers (paragraph 154 of his report) to the Draft Local Plan material including '*published documents which largely read as a series of inspirational and visionary assertions and proclamations*'. It is small wonder that developers and estate agents make use of such content for their own marketing purposes.

You may recall the press release issued by OPDC in September 2017 at the start of construction at Oaklands Rise. This included quotes from you and James Murray under the title [Deputy Mayor kick starts the UK's largest regeneration project](#). The views from new occupants who have moved into this development in 2022 are very different.

Our members are realistic about the external pressures on the Corporation. But we do look for a more imaginative (and up to date) response on how this part of London should now be redeveloped, in circumstances different to those that prevailed in 2015. The OPDC Local Plan (in our view) provides a poor vehicle for next steps -- as a result of its painful, disrupted and lengthy process of gestation.

But if the Plan's policies and site allocations are applied with care, learning from London's recent history successes and failures in urban renewal (Kings Cross and VNEB respectively) a sustainable new Old Oak could still emerge. We believe that this will take a long time yet, and that the Mayor needs to be willing to rethink housing and employment targets that were never going to be achievable.

The willingness of local people to work with OPDC in achieving this goal is very much in the balance in 2022. We urge you and you fellow Board members to consider the five steps that we have suggested above, as a necessary stage in rebuilding some trust and confidence in the work of the Corporation. These are not unreasonable proposals.

I am not copying this letter to all Board and Planning Committee members. But I am including the two MPs primarily involved in the future of Old Oak along with the three Borough Leaders. At a time of local elections across London we believe that these elected representatives have more of an ear to the ground than most of those OPDC decision-makers who have been appointed by the Mayor (who have no accountability to those who live or work at Old Oak). This is why we feel that a round-table session at which OPDC members can hear directly from the public would be helpful.

Regards,

Henry Peterson
Adviser to the Old Oak Neighbourhood Forum

Cc Rupa Huq MP, Andy Slaughter MP
Stephen Cowan LBHF, Peter Mason LBE, Muhammed Butt LB Brent
William Hill, Chair of OPDC Planning Committee
David Lunts OPDC, Emma Williamson OPDC, Tom Cardis OPDC
Mark Walker, Chair OONF